

**Commonwealth of Kentucky
Environmental and Public Protection Cabinet
Department for Environmental Protection
Division for Air Quality
803 Schenkel Lane
Frankfort, Kentucky 40601
(502) 573-3382**

**AIR QUALITY PERMIT
Issued under 401 KAR 52:040**

Permittee Name: Koppers, Inc.
Mailing Address: 198 Fairground Road,
Guthrie, KY 42234

Source Name: Koppers, Inc.
Mailing Address: P.O. Box 8
Guthrie, KY 42234-0008

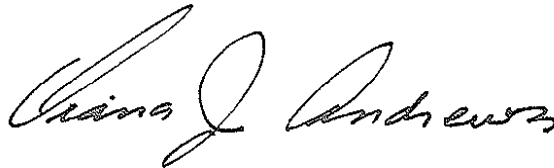
Source Location: Same as Above

Permit: S-06-036 R1
Agency Interest: 4021
Activity: APE20070001
Review Type: State Origin - Operating
Source ID: 21-219-00013

Regional Office: Bowling Green Regional Office
1508 Western Avenue
Bowling Green,
KY 42104
(270) 746-7475

County: Todd

Application
Complete Date: March 10, 2006
Issuance Date: April 3, 2006
Revision Date: November 13, 2007
Expiration Date: April 3, 2016



**John S. Lyons, Director
Division for Air Quality**

SECTION A - PERMIT AUTHORIZATION

Pursuant to a duly submitted application the Kentucky Division for Air Quality hereby authorizes the operation of the equipment described herein in accordance with the terms and conditions of this permit. This permit has been issued under the provisions of Kentucky Revised Statutes Chapter 224 and regulations promulgated pursuant thereto.

The permittee shall not construct, reconstruct, or modify any affected facilities without first submitting a complete application and receiving a permit for the planned activity from the permitting authority, except as provided in this permit or in 401 KAR 52:040, State-origin permits.

Issuance of this permit does not relieve the permittee from the responsibility of obtaining other permits, licenses, or approvals that may be required by the Cabinet or other federal, state, or local agencies.

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

Emission Unit 01 (EP-01) Wood Fired Boiler:

Description:

Maximum continuous rating: 15 mmBtu/hour
Construction commenced: 1981
Control Device: None

APPLICABLE REGULATIONS:

401 KAR 59:015—New indirect heat exchangers. Applicable with respect to particulate emissions and sulfur dioxide emissions to each affected facility with a capacity of 250 mmBtu/hr or less and commenced on or after April 9, 1972.

1. Operating Limitations:

None

2. Emission Limitations:

- a. Section 4(1) limits emissions of particular matter to no more than 0.51 lb per million Btu of actual heat input.
- b. Section 4(2) limits visible emissions to a maximum of 20% opacity except for emissions occurring during cleaning of firebox, blowing soot, and building new fire.
 - i. While cleaning the firebox or blowing of soot is being done, visible emissions are limited to a maximum of 40% opacity for not more than 6 consecutive minutes in any 60 consecutive minutes.
 - ii. For emissions from an indirect heat exchanger during building of a new fire for the period required to bring the boiler up to operating conditions provided the method used is that recommended by the manufacturer and the time does not exceed the manufacturer's recommendations.
- c. Section 5(1) limits emissions of any gas which contains sulfur dioxide to no more than: $SO_2 = 4.18 \text{ lb/mmBtu}$.

Compliance Demonstration Method:

- a. Compliance with the particulate matter limit is demonstrated by an emission factor of 0.4 lb/mmBtu, by the combustion of only wood.
- b. For compliance with the opacity limit, refer to 4. Monitoring Requirements and 5. Recordkeeping Requirements
- c. Compliance with the sulfur dioxide limit is demonstrated by an emission factor of 0.025 lb/mmBtu, by the combustion of only wood.

3. Testing Requirements:

Refer to 4, Monitoring Requirements.

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

4. Monitoring Requirements:

The permittee shall perform weekly visual observations. If emissions are observed, an EPA Method 9 test shall be performed.

5. Recordkeeping Requirements:

- a. A record for the amount of wood burned in the boiler shall be maintained.
- b. A log indicating days of operation shall be maintained.
- c. Dates and descriptions of maintenance shall be recorded.
- d. A record of the weekly visual observations and each EPA Method 9 test, if any were performed.

6. Reporting Requirements:

Refer to Section C.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Emission Unit 03 (EP-03) Wood Fuel Handling System
Emission Unit 04 (EP-04) Wood Boring Mill Trim Saws

Description:

Wood Fuel Handling System: Maximum Rate: 1.8 tons wood processed per hour
Control Device: None (Outside Unit)
Date of Construction: 1981

Wood Boring Mill Trim Saw: Maximum Rate: 186.4 average untreated wood processed/hr.
Control Device: None
Date of Construction: 1981

Applicable Regulations:

401 KAR 63:010 Fugitive Emissions

1. Operating Limitations:

Pursuant to KAR 401 63:010, no person shall cause, suffer, or allow any material to be handled, processed, transported, or stored; a building or its appurtenance to be constructed, altered, repaired or demolished, or a road to be used without taking reasonable precaution to prevent particulate matter from being air borne. Such reasonable precautions shall include, when applicable, but not be limited to the installation and use of hoods, fans, and fabric filters to enclose the dusty material from the wood fuel handling system.

Compliance Demonstration Method:

Refer to Section C.6.b. for compliance certification.

2. Emission Limitations:

Pursuant to KAR 401 63:010, no person shall cause or permit the discharge of visible fugitive dust emissions beyond the lot line of the property on which emissions originate.

Compliance Demonstration Method:

For compliance with the emission limit, refer to 1. Operating Limitations.

3. Testing Requirements:

None

4. Monitoring Requirements:

None

5. Recordkeeping Requirements:

None

6. Reporting Requirements:

None

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Emission Unit: 02	(EP# 02a)	Creosote Storage (work) Tanks
	(EP# 02b)	Creosote Treatment Cylinders
	(EP# 05)	Treated Wood Storage Yard
	(EP# 06)	Equipment Leaks

Description:

Date of Construction: 1910
Maximum Rate: 703 gallons of creosote/hr
557.3 Treated Ties Stored/hr
Control Device: None

Applicable Regulations:

401 KAR 63:020 Potentially hazardous matter or toxic substances emissions.

1. Operating Limitations:

Pursuant to 401 KAR 63:020 persons responsible for a source from which hazardous matter or toxic substances may be emitted shall provide utmost care and consideration, in handling of the materials, to the potential harmful effects of the emissions resulting from such activities. No owner or operator shall allow any affected facility to emit potentially hazardous matter or toxic substances in such quantities or duration as to be harmful to the health and welfare of humans, animals and plants.

Compliance Demonstration Method:

Refer to Section C.6.b. for compliance certification.

2. Emission Limitations:

None

3. Testing Requirements:

None

4. Monitoring Requirements:

None

5. Recordkeeping Requirements:

- Permittee shall keep a record of the amount of three types of creosote purchased during the month.
- Permittee shall keep a record of the number of railroad ties treated during the month.

6. Reporting Requirements:

None

SECTION C - GENERAL CONDITIONS

1. Administrative Requirements

- a. The permittee shall comply with all conditions of this permit. Noncompliance shall be a violation of 401 KAR 52:040, Section 3(1)(b) and is grounds for enforcement action including but not limited to the termination, revocation and reissuance, or revision of this permit.
- b. This permit shall remain in effect for a fixed term of ten (10) years following the original date of issue. Permit expiration shall terminate the source's right to operate unless a timely and complete renewal application has been submitted to the Division at least six months prior to the expiration date of the permit. Upon a timely and complete submittal, the authorization to operate within the terms and conditions of this permit, including any permit shield, shall remain in effect beyond the expiration date, until the renewal permit is issued or denied by the Division. [401 KAR 52:040, Section 15]
- c. Any condition or portion of this permit which becomes suspended or is ruled invalid as a result of any legal or other action shall not invalidate any other portion or condition of this permit [Section 1a-11 of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040 Section 23].
- d. Pursuant to materials incorporated by reference by 401 KAR 52:040, this permit may be revised, revoked, reopened, reissued, or terminated for cause. The filing of a request by the permittee for any permit revision, revocation, reissuance, or termination, or of a notification of a planned change or anticipated noncompliance shall not stay any permit condition [Section 1a-4, 5, of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040 Section 23].
- e. This permit does not convey property rights or exclusive privileges [Section 1a-8 of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040 Section 23].
- f. Nothing in this permit shall alter or affect the liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance [401 KAR 52:040 Section 11(3)].
- g. All previously issued permits to this source at this location are hereby null and void.

SECTION C - GENERAL CONDITIONS (CONTINUED)

2. Recordkeeping Requirements

- a. Records of all required monitoring data and support information, including calibrations, maintenance records, and original strip chart recordings, and copies of all reports required by the Division for Air Quality, shall be retained by the permittee for a period of at least five years and shall be made available for inspection upon request by any duly authorized representative of the Division for Air Quality [401 KAR 52:040 Section 3(1)(f) and Section 1b-IV-2 of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040 Section 23].
- b. The permittee shall perform compliance certification and recordkeeping sufficient to assure compliance with the terms and conditions of the permit. Documents, including reports, shall be certified by a responsible official pursuant to 401 KAR 52:040, Section 21.

3. Reporting Requirements

- a. (1) In accordance with the provisions of 401 KAR 50:055, Section 1, the permittee shall notify the Regional Office listed on the front of this permit concerning startups, shutdowns, or malfunctions as follows:
 - i. When emissions during any planned shutdowns and ensuing startups will exceed the standards, notification shall be made no later than three (3) days before the planned shutdown, or immediately following the decision to shut down, if the shutdown is due to events which could not have been foreseen three (3) days before the shutdown.
 - ii. When emissions due to malfunctions, unplanned shutdowns and ensuing startups are or may be in excess of the standards, notification shall be made as promptly as possible by telephone (or other electronic media) and shall be submitted in writing upon request.
- (2) The permittee shall promptly report deviations from permit requirements including those attributed to upset conditions (other than emission exceedances covered by Reporting Requirement condition a.(1) above), the probable cause of the deviation, and corrective or preventive measures taken; to the Regional Office listed on the front of this permit within 30 days. Other deviations from permit requirements shall be included in the semiannual report [Section 1b-V-3 of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040 Section 23].
- b. The permittee shall furnish information requested by the Cabinet to determine if cause exists for modifying, revoking and reissuing, or terminating the permit; or to determine compliance with the permit [Section 1a-6 of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040 Section 23].
- c. Summary reports of monitoring required by this permit shall be submitted to the Regional Office listed on the front of this permit at least every six (6) months during the life of this permit. For emission units that were still under construction or which had not commenced operation at the end of the 6-month period covered by the report and are subject to monitoring requirements in this permit, the report shall indicate that no monitoring was performed during

SECTION C - GENERAL CONDITIONS (CONTINUED)

the previous six months because the emission unit was not in operation. The summary reports are due January 30th and July 30th of each year. All deviations from permit requirements shall be clearly identified in the reports. All reports shall be certified by a responsible official pursuant to 401 KAR 52:040, Section 21.

4. Inspections

In accordance with the requirements of 401 KAR 52:040, Section 3(1)(f) the permittee shall allow authorized representatives of the Cabinet to perform the following during reasonable times. Reasonable times are defined as during all hours of operation, during normal office hours; or during an emergency:

- a. Enter upon the premises to inspect any facility, equipment (including air pollution control equipment), practice, or operation.
- b. To access and copy any records required by the permit.
- c. Inspect, at reasonable times, any facilities, equipment (including monitoring and pollution control equipment), practices, or operations required by the permit.
- d. Sample or monitor, at reasonable times, substances or parameters to assure compliance with the permit or any applicable requirements.

5. Emergencies/Enforcement Provisions

- a. The permittee shall not use as defense in an enforcement action, the contention that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance [Section 1a-3 of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040 Section 23].
- b. An emergency shall constitute an affirmative defense to an action brought for the noncompliance with the technology-based emission limitations if the permittee demonstrates through properly signed contemporaneous operating logs or relevant evidence that:
 - (1) An emergency occurred and the permittee can identify the cause of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During an emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and
 - (4) The permittee notified the Division as promptly as possible and submitted written notice of the emergency to the Division within two working days after the time when emission limitations were exceeded due to the emergency and included a description of the emergency, steps taken to mitigate emissions, and corrective actions taken.
- c. Emergency provisions listed in General Condition 5.b are in addition to any emergency or upset provision contained in an applicable requirement [401 KAR 52:040, Section 22(1)].

SECTION C - GENERAL CONDITIONS (CONTINUED)

- d. In an enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof. [401 KAR 52:040, Section 22(2)].

6. Compliance

- a. Periodic testing or instrumental or non-instrumental monitoring, which may consist of record keeping, shall be performed to the extent necessary to yield reliable data for purposes of demonstration of continuing compliance with the conditions of this permit. For the purpose of demonstration of continuing compliance, the following guidelines shall be followed:
- (1) Pursuant to 401 KAR 50:055, General compliance requirements, Section 2(5), all air pollution control equipment and all pollution control measures proposed by the application in response to which this permit is issued shall be in place, properly maintained, and in operation at any time an affected facility for which the equipment and measures are designed is operated, except as provided by 401 KAR 50:055, Section 1.
 - (2) All the air pollution control systems shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers. A log shall be kept of all routine and nonroutine maintenance performed on each control device. Daily observations are required during daylight hours of all operations, control equipment and any visible emissions to determine whether conditions appear to be either normal or abnormal. If the operations, controls and/or emissions appear to be abnormal, the permittee must then comply with the requirements of Section C – General Conditions, 3.a.(2), of this permit.
 - (3) A log of the monthly raw material consumption and monthly production rates shall be kept available at the facility. Compliance with the emission limits may be demonstrated by computer program, spread sheets, calculations or performance tests as may be specified by the Division [401 KAR 50:055, Section 2].
- b. Pursuant to 401 KAR 52:040, Section 19, the permittee shall certify compliance with the terms and conditions contained in this permit by January 30th of each year, by completing and returning a Compliance Certification Form (DEP 7007CC) (or an approved alternative) to the Regional Office listed on the front of this permit in accordance with the following requirements:
- (1) Identification of the term or condition;
 - (2) Compliance status of each term or condition of the permit;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The method used for determining the compliance status for the source, currently and over the reporting period, and
 - (5) For an emissions unit that was still under construction or which has not commenced operation at the end of the 12-month period covered by the annual compliance certification, the permittee shall indicate that the unit is under construction and that compliance with any applicable requirements will be demonstrated within the timeframes specified in the permit.

SECTION C - GENERAL CONDITIONS (CONTINUED)

- (6) The certification shall be postmarked by January 30th of each year. Annual compliance certifications shall be mailed to the following addresses:

Division for Air Quality
Bowling Green Regional Office
1508 Western Avenue
Bowling Green, KY 42104

Division for Air Quality
Central Files
803 Schenkel Lane
Frankfort, KY 40601-1403

- c. Permit Shield - A permit shield shall not protect the owner or operator from enforcement actions for violating an applicable requirement prior to or at the time of permit issuance. Compliance with the conditions of this permit shall be considered compliance with all:
- (1) Applicable requirements that are included and specifically identified in this permit; or
 - (2) Non-applicable requirements expressly identified in this permit [401 KAR 52:040, Section 11].

7. Construction Requirements:

N/A

SECTION D - INSIGNIFICANT ACTIVITIES

The following listed activities have been determined to be insignificant activities for this source pursuant to 401 KAR 52:040, Section 6. Although these activities are designated as insignificant the permittee must comply with the applicable regulation. Process and emission control equipment at each insignificant activity subject to a general applicable regulation shall be inspected monthly and a qualitative visible emissions evaluation made. Results of the inspections and observations shall be recorded in a log, noting color, duration, density (heavy or light), cause, and any corrective actions taken due to abnormal visible emissions.

<u>Description</u>	<u>Generally Applicable Regulation</u>
1. Creosote Unloading	N/A
2. Waste Water Treatment Sumps	N/A
3. Gasoline Tank (560gal)	N/A
4. Three Diesel Tanks	N/A
5. Welding, Grinding and Torch cutting	N/A
6. Painting	N/A
7. Bulk Oil Tank (4-250 gal)	N/A
8. Used Oil Tank (350gal)	N/A